

William Tatum
PEN Products - Westville Correctional Facility
P.O. Box 473
Westville, IN 46391

Re: Source Specific Operation Status
S 091-7854-00109

Dear William Tatum:

Your application for Source Specific Operation Status was received on December 13, 1996 and has been reviewed. Based on the data submitted and the provisions in 326 IAC 2, it has been determined that your emission source, a stationary facility with auto refinishing, abrasive cleaning, graphic arts, and woodwork located at S.R. 2 & C.R. 1100 West, Westville, Indiana 46391, has met the criteria required to obtain a Source Specific Operating Agreement. All terms and conditions in such registrations and permits are no longer in effect.

Pursuant to IC 4-21.5-3-5(a) and (b), approval of this Source Specific Operating Agreement shall not be effective until fifteen (15) days from the date of this letter.

The facilities and processes of this source are hereby granted the Source Specific Operating Agreement provided that the following requirements of 326 IAC 2-9 are satisfied:

Section A: Surface Coating or Graphic Arts Operation: [326 IAC 2-9-2.5]

1. The total amount of solvent containing material from the graphic arts operation at the source shall not exceed two thousand (2,000) gallons per twelve (12) month period.
2. The source shall keep the following records of the graphic arts operation:
 - (a) purchase orders or invoices of all solvent containing materials, and
 - (b) an annual summation on a calendar year basis of purchase orders or invoices for all solvent containing materials.

These records shall be kept for a minimum period of five (5) years, and shall be made available upon request of the Office of Air Management (OAM).

3. Particulate matter emissions shall be controlled by a dry filter system or an equivalent control device. The source shall operate the particulate control device at all times the graphic arts operation is in operation in accordance with the manufacturer's specifications. A source shall be considered in compliance with this requirement provided the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.
4. Include with the annual notice required in Condition 1 of the General Requirements Section, an inventory listing of the monthly volatile organic compound (VOC) and hazardous air pollutant (HAP) totals, and the total VOC and HAP emissions for the previous twelve (12) months.

Section B: Woodworking Operation: [326 IAC 2-9-4]

1. The particulate matter with a diameter less than ten (10) microns (PM10) from the woodworking operation shall not exceed one-thousandth (0.001) grain per actual cubic foot of outlet air.
2. No visible emissions shall be discharged to the outside air from the woodworking operation.
3. The source shall not at any time, exhaust to the atmosphere, greater than four hundred thousand (400,000) actual cubic feet of outlet air per minute.
4. The source shall maintain records of the types of air pollution control devices utilized at the source, and the operation and maintenance manuals for those devices.
5. Compliance with the limitations of this Source Specific Operating Agreement (SSOA) shall be determined utilizing the test methods specified in 40 CFR 60, Appendix A, Methods 1-4 and 201A.

Section C: Abrasive Cleaning Operation: [326 IAC 2-9-5]

1. The units of the abrasive cleaning operation shall be totally enclosed.
2. The particulate matter (PM) emissions from the abrasive cleaning operation shall not exceed one-hundredth (0.01) grain per actual cubic foot of outlet air.
3. The exhaust air flow rate of the abrasive cleaning operation shall not exceed forty thousand (40,000) actual cubic feet of outlet air per minute.
4. The source shall maintain records of the types of air pollution control devices utilized at the source and the abrasive cleaning operation, and the operation and maintenance manuals for those devices.

Section D: Automobile Refinishing Operation: [326 IAC 2-9-11]

1. The total amount of solvent containing material delivered to the automobile refinishing operation, less the amount of solvent containing material quantified by manifest as having been shipped off-site, shall not exceed two thousand (2,000) gallons per year.
2. The usage of condition 1 of this operating agreement shall be determined based on either:
 - (a) actual use records, or
 - (b) purchase records.
3. Particulate matter emissions shall be controlled by a dry filter system or an equivalent control device. The source shall operate the particulate control device at all times the automobile refinishing operation is in operation in accordance with the manufacturer's specifications. A source shall be considered in compliance with this requirement provided the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.
4. The source shall keep the following records from the automobile refinishing operation:
 - (a) purchase or use records of solvent containing materials,
 - (b) an annual summation on a calendar year basis of purchase or use records for all solvent containing materials, and
 - (c) the amount of waste solvent containing material manifested off-site.

These records shall be kept for a minimum period of five (5) years, and made available upon request of the Office of Air Management (OAM).

Section E: General Requirements: [326 IAC 2-9-1]

1. The source shall provide an annual notice to the commissioner, stating that the source is in operation, and certifying that its operations are in compliance with the requirements of this Source Specific Operating Agreement. The above annual notice shall be submitted to:

**Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than January 30 of each year, with the annual notice being submitted in the format attached.

2. Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
3. Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61.

Any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from the Office of Air Management (OAM) under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

Sincerely,

Paul Dubenetzky, Chief
Permit Branch
Office of Air Management

kt

cc: File - LaPorte County
LaPorte County Health Department
Air Compliance Section - Rick Massoels
Permit Tracking - Janet Mobley
Technical Support & Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Source Specific Operating Agreement Annual Notification
--

This form should be used to comply with the notification requirements under 326 IAC 2-9.

Company Name:	PEN Products - Westville Correctional Facility
Address:	S.R. 2 & C.R. 1100 West
City:	Westville, Indiana 46391
Contact Person:	
Phone #:	
SSOA #:	S 091-7854-00109

I hereby certify that PEN Products - Westville Correctional Facility is still in operation and is in compliance with the requirements of Source Specific Operating Agreement (SSOA) S 091-7854-00109.

Name (typed):
Title:
Signature:
Date: